



U.S. Department of Justice
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Via ECF and by Fax

The Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *Knight First Amendment Institute at Columbia University, et al. v. Trump, et al.*,
No. 17-cv-5205 (NRB)**

Dear Judge Buchwald,

The parties in the above-referenced matter write to update the Court on the status of their negotiations regarding a joint stipulation of facts. The parties have exchanged drafts of a proposed joint stipulation of facts and continue to believe that this approach is broadly workable, although they are still negotiating certain details. The parties will endeavor to file a joint stipulation and propose a briefing schedule by next Friday. If the parties are unable to do so by next Friday, they will propose a schedule for further proceedings.

In addition, in light of these ongoing negotiations, Defendants respectfully request that the deadline for Defendants to file a responsive pleading to the Complaint be extended from September 15, 2017, to September 29, 2017. There have been no previous requests for an extension of this deadline. Plaintiffs do not object to this request.

Respectfully submitted,

/s/ Jameel Jaffer

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